

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

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STATE OF TEXAS, <i>et al.</i>	)
	)
	)
Plaintiffs	)
v.	)
	)
	)
DEPARTMENT OF HOMELAND	)
SECURITY., <i>et al.</i>	)
	)
Defendants.	)
	)

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No. 6:23-cv-00007

**DEFENDANTS' UNOPPOSED MOTION TO EXCEED WORD LIMIT FOR THEIR  
REPLY IN SUPPORT OF THE MOTION TO TRANSFER**

Defendants' respectfully request that the Court grant permission to exceed the allowed 2,000-word limit allowed for their Motion to Transfer. (Judge Drew B. Tipton Court Procedures Rule 16.c.). In light of the multiple important issues of federal venue law, Defendants request that the word limit be enlarged to 4,812 words. Defendants seek this enlargement for good cause and in the interest of justice, not for delay, and no party will be prejudiced if this motion is granted. Plaintiffs do not oppose the request.

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Dated: February 19, 2023

Respectfully submitted,

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*United States Attorney*

BRIAN M. BOYNTON  
*Principal Deputy Assistant Attorney General*

WILLIAM C. PEACHEY  
*Director*  
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/s/ Erez Reuveni  
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BRIAN WARD  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 19, 2023, I electronically filed this brief with the Clerk of the Court for the United States District Court for the Southern District of Texas by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

*/s/ Erez Reuveni*  
EREZ REUVENI  
U.S. Department of Justice

**CERTIFICATE OF CONFERENCE**

I certify that on February 17, 2023, undersigned counsel conferred with counsel for Defendants. Plaintiffs consent to Plaintiffs motion to enlarge.

*/s/ Erez Reuveni*  
EREZ REUVENI

**CERTIFICATE OF COMPLIANCE**

I certify that the total number of words in this motion, exclusive of the matters designated for omission, is 83, as counted by Microsoft Word.

*/s/ Erez Reuveni*  
EREZ REUVENI